# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS, BOSTON DIVISION

YVONNE LESTER, individually and on behalf of all others similarly situated,

Plaintiff,

V.

EVERQUOTE, INC., f/k/a AdHarmonics, Inc., A Delaware Corporation,

Defendant.

Case No.: 1:16-cv-10651

### STIPULATION FOR EXTENSION TO RESPOND TO PLAINTIFF'S COMPLAINT

The parties to the above entitled action, by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiff Yvonne Lester filed a Class Action Complaint ("Complaint") on April 1, 2016;

WHEREAS, the current deadline for Defendant to respond to the Complaint is May 2, 2016.

WHEREAS, Defendant recently retained counsel in this matter. In order to allow the parties to informally exchange information pre-litigation, the parties have agreed that Defendant may have a thirty-day extension, until and including June 1, 2016, to respond to Plaintiff's Complaint;

WHEREAS, Defendant has not made any prior requests for an extension of time to respond in this action.

WHEREAS, this stipulation is made in good faith and not for purposes of delay;

## IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and

Defendant, that the time for Defendant to respond to Plaintiff's Complaint is extended until and including June 1, 2016. The parties respectfully request the Court to enter an Order confirming this schedule.

DATED: 05/2/2016 BLANK ROME LLP

By: /s/ Joshua Briones

Attorneys for Defendant EVERQUOTE, INC., f/k/a AdHarmonics, Inc.

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\* Pro hac vice application to be filed.

DATED: 05/2/2016 MIRABELLA LAW LLC

By: /s/ Erica C. Mirabella

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#### **CERTIFICATE OF SERVICE**

I, Erica C. Mirabella, hereby certify that on May 4, 2016, I caused to be served the above and foregoing *Stipulation for Extension to Respond to Plaintiff's Complaint* by causing a true and accurate copy to be sent via electronic mail to the following:

Joshua Briones JBriones@BlankRome.com E. Crystal Lopez ECLopez@BlankRome.com BLANK ROME LLP 2029 Century Park East, 6<sup>th</sup> Floor Los Angeles, CA 90067

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/s/ Erica C. Mirabella
Erica C. Mirabella

<sup>\*</sup> *Pro hac vice* application to be filed.

# [PROPOSED] ORDER

GOOD CAUSE SHOWING, the Stipulation to Extend Defendant's Time to Respond to Plaintiff's Complaint is GRANTED in its entirety. Defendant Everquote, Inc., f/k/a AdHarmonics, Inc. shall have up to and including June 1, 2016 to file a response to the Complaint.

IT IS SO ORDERED.		
Dated:	·	
	Hon. Mark L. Wolf United States District Court Judge	